UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

UNITED STATES OF AMERICA)	
)	
)	
VS.)	NO. 3:21-CR-126
)	Judges Crytzer/Poplin
MARCO ANTONIO CARDENAS,)	
)	

DEFENDANT'S MOTION TO CONTINUE DEADLINE TO FILE A PLEA AGREEMENT AND RELATED DEADLINES

COMES NOW the Defendant, Marco Cardenas, by and undersigned counsel, and moves this Honorable Court to continue his deadline to file a plea agreement and related deadlines. Mr. Cardenas is currently negotiating a resolution for this case with the United States, and Mr. Cardenas is waiting for the United States to provide Defendant with the necessary agreement. Defendant had discussed the extension of the plea deadline and related deadlines with the United States, and they do not object to the extension. Without objections and in the best interest s of justice, Mr. Cardenas deadline to file a plea agreement and related deadlines should be extended for the Parties to negotiate the resolution of this case.

Respectfully Submitted this 10th day of August, 2022.

/s/ Hoai Robinette, BPR # 036174 /s/ Phil Lomonaco,, BPR # 11579 Attorneys for Defendant 800 S. Gay Street, Suite 2031 Knoxville, TN 37929 865-521-7422

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that on August 10^{th} , 2022, the foregoing was filed electronically. Notice of this filing was sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Hoai R. Robinette
Hoai Robinette